

# Morgan Lewis

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November 25, 2020

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Court, Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

Re: Julian et al. v. Metropolitan Life Insurance Co., No. 17-cv-00957 (AJN)(BCM)

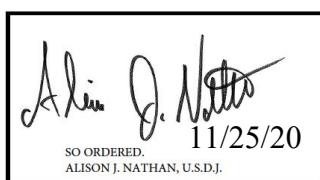
Dear Judge Nathan:

We represent Metropolitan Life Insurance Co. in the above-referenced matter. We write pursuant to Section 1.D of Your Honor's Individual Practices to respectfully request a one week extension of time, until December 2, to provide the Court with a letter explaining the need to seal or redact certain materials attached to the Declaration of Michael D. Palmer in Support of Plaintiff's Motion for Class Certification ("Palmer Declaration"). Dkt. 270. Plaintiffs consent to this request.

In support of their motion for Class Certification, Plaintiffs submitted 22 exhibits which had been designed as "Confidential" by Defendant, pursuant to the parties' Amended Confidentiality Agreement (Dkt. 122). Pursuant to Section 4.B of Your Honor's Individual Practices, Defendants currently have until November 25 to submit a letter explaining the need to seal or redact the 22 exhibits. However, given the number of exhibits Plaintiffs have filed under seal, as well as the fact that Thanksgiving falls this week, Defendant respectfully requests a short extension of time to file the letter with the Court. Defendant would like to carefully review each exhibit so that it only requests sealing where necessary. To do so, counsel will need to speak to relevant document authors and/or custodians, as well as with in-house attorneys and business leaders, some of whom are already out for the holiday. In addition, we hope to speak with Plaintiffs' counsel in an effort to streamline any remaining issues or create workarounds.

This is Defendant's first request for an extension of time to submit a letter explaining the need to seal or redact materials submitted with Plaintiff's motion for Class Certification.

SO ORDERED.



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Granting Defendant's request, and allowing its letter to be filed on December 2, 2020, will not affect any other dates in this action.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Christopher A. Parlo

Christopher A. Parlo

cc: Michael Palmer, Esq.; David Tracey, Esq.; Michael R. DiChiara, Esq. (Attorneys for Plaintiffs, via ECF)